

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Facilitating the Deployment of Text-to-911	)	PS Docket No. 11-153
and Other Next Generation 911 Applications)	)	
	)	
Framework for Next Generation	)	PS Docket No. 10-255
911 Deployment	)	

**COMMENTS OF NEXGEN GLOBAL TECHNOLOGIES, LLC**

NexGen Global Technologies, LLC (“NexGen”) submits these comments in response to Section III.B of the Commission’s Further Notice of Proposed Rulemaking (FNPRM) adopted on December 12, 2012 in the above-captioned proceeding.

NexGen has developed products and technologies for real time transmission of photos, video and text for law enforcement and first responder purposes. NexGen’s solution is a complement to text-to-911, and has the capability to accelerate and scale NG-911 services, with features and functionalities that can enhance public safety. NexGen’s technology is a hybrid SMS//MMS/IP solution. It can be deployed by PSAPs now, irrespective whether the existing infrastructure is analog or digital. No special software or app is required on the mobile device, and cell phone users can use any wireless carrier. The technology interconnects across all cell phones and wireless devices, and as a stand-alone system easily integrates into any existing communication center without costly IT hardware and software changes or additions. The system can be easily installed and all personnel trained on its use in minutes. Thus NexGen’s technology can dramatically accelerate deployment of multimedia emergency service

(MMES) (in particular photos and video), without the anticipated R&D or infrastructure cost, and time delay, associated with MMES in a pure IP environment.<sup>1</sup>

The FNPRM states, *“implementing text-to-911 represents a crucial next step in the ongoing transition of the legacy 911 system to a Next Generation 911 (NG911) system that will support not only text but will also enable consumers to send photos, videos, and data to PSAPs, enhancing the information available to first responders for assessing and responding to emergencies.”*<sup>2</sup> We reiterate that our solution for the delivery of photos, video and text for public safety is available now. It is also IP-compatible, and thus can complement an eventual NG911 solution that includes MMES.

The FNPRM states, *“providing precise location information in connection with text messages is technically feasible but could involve significant changes and upgrades to existing SMS-based text networks.”*<sup>3</sup> Accordingly the FNPRM seeks comment on *“whether operating system vendors or CMRS providers can facilitate the delivery of more precise location for interconnected text providers. Are there any other factors that the Commission should consider in regard to location delivery for interconnected text providers?”*<sup>4</sup> Other commenters as well have noted the importance of location information to assist public safety and law enforcement.<sup>5</sup>

In our 02/27/2013 filing, we noted that we are developing a module for longitude / latitude (x/y) coordinates.<sup>6</sup> We anticipate that it will be deployable in the same user-

---

<sup>1</sup> For a more comprehensive review of NexGen’s technologies, please see our letter dated 02/27/2013 in PS Dockets 12-333, 11-153 and 10-255, at: <http://apps.fcc.gov/ecfs/document/view?id=7022125902>.

<sup>2</sup> FNPRM, para. 4 at p. 3.

<sup>3</sup> FNPRM, para. 123 at p. 48.

<sup>4</sup> Id. at p. 49.

<sup>5</sup> See for example filing of APCO dated 02/19/2013 in PS Dockets 11-153 and 10-255, on p. 2: *“FCC should promote the development of more precise 9-1-1 caller location information to support NG9-1-1.”* Available at: <http://apps.fcc.gov/ecfs/document/view?id=7022123116>.

<sup>6</sup> NexGen letter dated 02/27/2013 in PS Dockets 12-33, 11-153 and 10-255.

friendly manner as our photos, video and text solution, on existing analog or digital infrastructure.

In our 02/27/2013 filing, we also noted that we currently have under development a module for the speech and hearing impaired, and would keep the Commission apprised of progress.<sup>7</sup> 1 in 5 Americans have hearing loss in at least one ear, or about 48 million Americans; and 20% of the US population aged 12 years and older have hearing difficulties severe enough to impact communication.<sup>8</sup>

As the Commission develops a framework and policies with respect to text-to-911 and NG911 for public safety, we ask that the Commission remain cognizant that MMES capabilities (to transmit photos, video and text) are available now; and that development of modules for location information and for the speech and hearing impaired are anticipated in the coming months.

Respectfully submitted,

/s/ Rick Shaffer

---

Rick Shaffer  
CEO  
NexGen Global Technologies, LLC  
1511 East State Road 434  
Winter Springs, FL 32708  
(800) 932-6751  
<http://nexgengt.com>

March 11, 2013

---

<sup>7</sup> Id.

<sup>8</sup> See <http://hearinghealthfoundation.org/statistics?gclid=CPWcmrLLz7UCFQvpnAodvXEARQ>.